

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109

Reply Comments of the Public Service Commission of Wisconsin

The Public Service Commission of Wisconsin (PSCW) respectfully submits reply comments to the Federal Communications Commission's (FCC or Commission) Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking (NPRM) released February 9, 2011, in the above-captioned dockets. The NPRM seeks comments on proposals to fundamentally change and modernize the FCC's universal service and intercarrier compensation system.

The PSCW appreciates the opportunity to comment on the far-ranging issues covered in this rulemaking. A review of the initial comments shows that all segments of the industry are in agreement that some form of reform is needed and the PSCW concurs. The PSCW supports the overall direction of the changes proposed in the NPRM to more efficiently utilize universal

service support, rationalize charges between carriers, and advance broadband deployment through the re-purposing of a portion of the Universal Service Fund (USF). Reform of these various mechanisms has been under consideration by the FCC for the last ten years. The PSCW has previously commented in many of the dockets subsumed in this rulemaking. A brief summary of those comments is attached as Appendix A. While in general agreement with the direction of reform, these reply comments join in some particular concerns raised by other parties' initial comments regarding the proposed end points of reform and the associated supporting policy rationale. These reply comments provide Wisconsin data and experience to assist the FCC in its deliberations.

Rates for Intercarrier Compensation

Like the comments of the Nebraska Public Service Commission (NPSC), these reply comments question the NPRM's stated goal of eliminating all minute-of-use charges for intercarrier compensation. The NPRM states, "This long-term reform would gradually phase out the current per minute [intercarrier compensation] system. . . ." ¹ However, the FCC also stated in the NPRM that it is still open to "additional concepts that should guide the Commission's evaluation of the appropriate end-point for . . . reform." ² The NPRM also asks that, "Parties proposing such concepts should describe how they advance, or are consistent with, the transition to all-[Internet Protocol] networks, as well as the other reforms discussed in this Notice." ³ Consistent with prior comments submitted by the PSCW, these reply comments explain that there are costs associated with the function of transporting and terminating traffic for which intercarrier compensation is appropriately paid. Like the NPSC, the PSCW believes the FCC

¹ NPRM ¶ 34. Also see NPRM ¶ 523, "We seek comment below on the ultimate end-point once the transition away from per-minute intercarrier compensation rates is complete." Also see ¶ 532 where the FCC refers to "the National Broadband Plan recommendations concerning the elimination of per-minute charges."

² NPRM ¶ 528.

³ NPRM ¶ 528.

must preserve state authority to determine and set intrastate access rates. Like the NPSC, the PSCW believes that state commissions are familiar with carriers' overall cost structures and investments and are in the best position to determine whether access rates are close to costs. The PSCW opposes a mandatory bill-and-keep regime and agrees with the NPSC that such arrangements may be appropriate where mutual agreement occurs. However, in a number of cases, such arrangements will not fairly compensate providers.⁴

Recovering variable costs through usage-based rates sends proper price signals for network utilization. The PSCW commented in 2006 on the Missoula Plan that rates that are artificially set, "pegged rates," are not consistent with the pricing standards of the Telecommunications Act of 1996 (TA 96) nor are they consistent with the roles that are established for the FCC and state commissions by TA 96. The current proposal that moves to peg the intercarrier compensation rate at zero as an end point of reform is likewise inconsistent with these standards and roles. The PSCW's further comments on the Missoula Plan explained that intercarrier compensation rates must at least recover traffic-sensitive costs.

Pricing intercarrier compensation based on costs is also consistent with all Internet Protocol (IP) networks. The NPRM quotes the National Broadband Plan (NBP) stating "per-minute charges are inconsistent with peering and transport arrangements for IP networks, where traffic is not measured in minutes, but instead [payments] are typically based on charges for the amount of bandwidth consumed per month."⁵ Even with IP networks, some form of measurement of bandwidth consumed is needed in order to determine charges between carriers. Significantly, the analysis supporting NBP Recommendation 8.7 calls for "the elimination of per

⁴ Comments of the Nebraska Public Service Commission for Sections I through XIV and Reply Comments for Section XV, April 18, 2001, WC Docket No. 10-90, *et. al.*, p. 27 (*NPSC Initial Comments*).

⁵ NPRM ¶ 505, National Broadband Plan, Chapter 8, p. 142.

minute above cost charges”⁶ and not simply the elimination of per minute charges. Methods of measurement of the consumption of bandwidth can be addressed. In any case, charges between carriers should not be zero. Setting the rate at zero may offer administrative ease, but it is not reflective of economic reality.⁷

Identifying Unserved Areas

The NPSC commented, and the PSCW agrees, that the FCC should additionally rely on state commissions to identify areas where the availability of broadband may be significantly under-represented based on census block information.⁸ The NPRM proposes to specify unserved areas eligible for Connect America Fund (CAF) federal universal service support on a census block basis using data compiled by the National Telecommunications and Information Administration (NTIA) or using data compiled from the FCC proposed revised Form 477.⁹ The use of census blocks, however, paints with a very broad brush, and can hide the fact that, while the majority of a census block may be served, there may well be subsections of the block which remain unserved. State commissions are in an important and more localized position to identify areas where the broad brush of census blocks may have missed.

The identification of areas served with broadband has improved significantly over time. Initially, the FCC had identified areas served with broadband by zip code and counted a zip code as “served” if a broadband connection was available in any portion of the zip code. Eventually, the FCC recognized that this method of identifying areas in which broadband service was

⁶ National Broadband Plan, p. 150.

⁷ It is notable that the Wisconsin Legislature recently took action to significantly reform the Wisconsin regulatory statutes relating to telecommunications. Included in the reforms are changes to the intrastate access charge regime that will require many carriers to reduce these charges over a specified period. 2011 Wisconsin Special Session Senate Bill 13. The legislation has passed both houses of the Legislature and is currently pending action by the Governor. The FCC should recognize and incorporate into its consideration the fact that many states, including Wisconsin, are taking action to address intrastate access rates. See *NPSC Initial Comments* at p. 6.

⁸ *NPSC Initial Comments*, p. 19-20.

⁹ NPRM ¶ 269.

available was insufficiently accurate, and revised the methods by which it identified served and unserved areas, including Form 477. Complete accuracy would require address-level information on service, which is not likely a cost-effective endeavor. Census blocks make data collection easier, but only with a sacrifice of quality. The PSCW believes the goal should be to find a cost-effective way to identify the gaps in using census blocks only, and believes that using information from state commissions is an effective way to accomplish this goal.

Indeed, through rulemaking proceedings and other dockets at the PSCW, we have acquired information that shows that the NTIA information is not entirely accurate. Specifically, we have had occasions where consumers have identified a lack of broadband availability in their communities. However, using census block level data would show that broadband was available in these communities. These are examples of how state commissions can be a significant benefit to the process of identifying unserved areas.

While the state and federal broadband maps provide useful policy tools to show the widespread areas of the nation that do not have access to broadband service, there should be additional mechanisms to further identify more discrete areas that do not have broadband service such that the areas could be eligible for universal service support. The PSCW and other state commissions are logical places to identify and implement these additional mechanisms.

Characteristics of Wireline and Wireless Networks

Like TDS Telecommunications Corporation (TDS Telecom), the PSCW believes that the FCC should reject the proposal in the NPRM to provide CAF support to only one entity per given geographic area. The PSCW agrees with TDS Telecom that such an approach would leave

high-cost areas without the complementary technologies of wireline and mobile wireless broadband access.¹⁰

In several parts of the NPRM, and specifically in ¶ 402, the Commission called for comments on whether support should be given to more than one provider, or more than one technology. The PSCW recognizes some inherent inefficiency in funding more than one provider of broadband service, but notes that the likely impact of limiting subsidies to a single provider will be to limit the availability of service to a single technology. If only the wireless provider is subsidized, the viability of the wireline provider could be severely stressed. If only the wireline provider is subsidized, then wireless 3G and 4G deployment is likely to be significantly delayed.

The PSCW notes that wireless and wireline providers are best able to offer different services. Wireless services are highly adapted to offering mobility and convenience, but can generally offer only voice and lower-bandwidth data. Wireline providers' offerings are not as mobile or convenient, but when they have upgraded to fiber-to-the-premises (FTTP), they can offer bandwidth that is simply impossible for wireless providers. A significant subset of today's customers, and an ever-growing percentage of customers in the future, will need the bandwidth available via fiber. This will be true of both urban and rural customers, whether residential or business. The PSCW is concerned that an approach that funds either wireless *or* wireline services will mean that the benefits of the unfunded service modality will be lost for those rural customers.

The PSCW is also aware that, for some classes of customers, a 4 Mbps speed may be insufficient. As is further identified below, this is an area where the FCC should provide

¹⁰ Comments of TDS Telecommunication Corporation, April 18, 2011, WC Docket No. 10-90, *et. al.*, pp.14-15.

flexibility for states to identify areas where a one-size-fits-all approach should be modified based on specific situations. Some anecdotal information from Wisconsin helps to illustrate this point.

At a Regional Broadband Planning Team¹¹ meeting in Stevens Point, Wisconsin, in November 2010, a representative of Marshfield Clinics explained that it made extensive use of broadband services, including *multiple* circuits running at 50 Gbps, which were used for transmitting medical imaging to remote locations. Marshfield Clinics has clinics in dozens of small towns across northern Wisconsin, and most of those are served by circuits in the 2-10 Mbps range. However, the existence of far larger circuits shows that rural service for some customers will require additional capacity.

At a Regional Broadband Planning Team meeting in Hayward, Wisconsin, in February 2011, an information technology consultant stated that he was recommending that many small businesses may require connections of at least 10 Mbps. He identified the combination of teleconferencing, e-commerce and other online needs that could quickly exhaust even that capacity, and that any business with less capacity will be at a disadvantage.

The PSCW also notes that a number of high-end businesses are located in semi-rural and rural areas of the state, and that they have exceptional bandwidth needs. Cray Inc. has computer manufacturing facilities in western Wisconsin. Lands End operates near Dodgeville, Wisconsin, and EPIC Systems, a major medical records software maker, is located on the edge of farm country, south of Verona, Wisconsin.

These are just a few examples, but they all indicate the same thing—that even if the majority of the rural population could be served by 4 Mbps service, a number of business and

¹¹ As part of the American Recovery and Reinvestment Act (ARRA) of 2009, the PSCW received stimulus funding to map, plan and promote broadband service in Wisconsin. One outcome of that process is the creation of nine Regional Broadband Planning Teams, each examining issues of accelerating broadband deployment in a part of the state. More information can be found at: <http://www.link.wisconsin.gov/lwi/default.aspx?page=52&bhcp=1>.

specialized customers need services far beyond that level. Therefore, flexibility and consideration of special circumstances like the ones identified here will be critical to the success of any FCC proposal on broadband.

Sufficient Universal Service Support

The NPRM sought data on end user rates and the impact of intercarrier compensation reform on the industry and consumers.¹² In its comments, the Wyoming Public Service Commission (Wyoming) showed that state's end user rates following the Wyoming efforts to remove all the implicit subsidies in switched access charges and to base such rates on costs. Wyoming raised its concern that the FCC has never solved the challenge of adequately funding high-cost universal service in Wyoming; the FCC does not present any solutions yet, and Wyoming has some local rates in excess of \$80 per month following its reduction of access rates to costs.¹³ Further, the State Members of the Federal State Joint Board on Universal Service (State Members) provided a substantial amount of data with their May 2, 2011, comments. The State Members provided estimates of local rate impacts if the revenue impacts of various proposals are offset by across-the-board rate increases that fully replace all lost revenues. To supplement the data provided by Wyoming, these reply comments provide data regarding Wisconsin telephone rates obtained from the PSCW's annual Wisconsin residential rate survey.¹⁴ These comments also provide Wisconsin financial data, based on PSCW local exchange carrier

¹² NPRM ¶ 492.

¹³ Initial Comments of the Wyoming Public Service Commission, April 18, 2011, WC Docket No. 10-90 *et. al.*, p. 3, 8.

¹⁴ Annually, the PSCW conducts a survey of residential rates. The PSCW computes the state-wide average residential rate as of December 31st each year. This rate is for a basic single-party residential flat rate which includes average local usage charges, touch-tone charges and extended area service charges, but does not include charges for "extended community calling" or intrastate long distance calling. The rate also includes state universal service support surcharges, but excludes federal universal service surcharges, taxes and other fees, and the residential \$6.50 federal subscriber line charge.

annual reports, applying the assumption of across-the-board rate impacts like the State Members' calculation.

The PSCW recommends that before the FCC adopts a position that the end point of reform should be the complete elimination of all intercarrier compensation charges, the FCC should consider how much universal service support will be necessary and whether there will be sufficient funds to provide reasonably comparable rates and services as required by 47 U.S.C. § 254(b) if such action is taken. The data provided with these reply comments helps quantify those amounts.

The statewide average residential rate in Wisconsin as of December 31, 2010, was \$17.31. Attached is the public version of the calculation of that rate that was recently sent out for comment. Obviously, some rates are above the statewide average rate and some are below. As can be seen, there are many Wisconsin rural companies with residential rates of greater than \$20 per month.¹⁵ These rates exist in Wisconsin, even considering all the other current existing sources of utility revenues, including access revenues and universal service support. FCC actions that could reduce those access revenues or universal service support would only serve to increase these rates.

¹⁵ By the time all taxes and other charges are included, these customers currently see a monthly local phone bill for these limited services of about \$30 per month.

The PSCW further provides data to help evaluate the impact on rates should all minute-of-use access revenues, as well as all existing universal service support, be lost. The table below summarizes the data.

Sum of All Wisconsin Rural Local Exchange Carriers¹⁶		
Type of Revenue	Annual Revenue	Per Month per Line Revenue
Local Network Service Revenue ¹⁷	\$209,000,000	\$26.14
Subscriber Line Charge	\$60,000,000	\$7.56
Switched Access	\$75,000,000	\$9.32
Federal Universal Service ¹⁸	\$89,000,000	\$11.18

The revenue generated from minute-of-use charges to other carriers amounts to \$75 million annually for rural incumbent local exchange carriers in Wisconsin. This is close to the total existing federal universal service support to these companies of \$89 million annually. While the State Members computed a weighted mean impact for their surveyed companies of \$16.47 per line per month for reducing intercarrier compensation rates to zero, the comparable number for Wisconsin rural incumbent local exchange carriers is \$9.32, still a substantial potential dollar impact. The data provided for Wisconsin is an average of all these companies, so the dollar amount per line for the highest costs companies would be expected to be even greater than that amount. The data does not consider secondary market impacts. If customers drop service because they cannot afford it, the carriers' revenues would further decline.

¹⁶ The PSCW maintains a data base of electronically filed annual reports from telecommunications utilities. While most individual company data is provided confidential treatment, the PSCW is able to provide summarized data that does not reveal company specific information. The data provided is for 2009 and is a sum of the revenue for all Wisconsin incumbent local exchange carriers that currently receive support through the federal universal service mechanism applicable to rural carriers. This does not include Wisconsin Bell, Inc., d/b/a AT&T Wisconsin, and Frontier North, Inc. (former Verizon North Inc., territories), although those carriers have rural areas as well.

¹⁷ Dollars include residential, single, and multi-line business revenues. Dollars do not include special access revenues such as DS-1 lines. Revenues for flat rates, usage, and optional services, such as caller ID and call waiting are included.

¹⁸ From USAC web site: About USAC/Resource Room/USAC FCC Filings: 4th Quarter 2009 annualized.

The NPRM appears to envision some form of universal service support to make up for the difference between the actual cost of termination and transport and the rate of zero proposed for this functionality¹⁹ in the NPRM’s proposal of a competitive bidding approach or right of first refusal approach to replace existing intercarrier compensation. The NPRM states, “Given the Commission’s long-term vision for the CAF, we anticipate intercarrier compensation replacement funding would not exist as a distinct component. Rather, as discussed above, such funding could be subsumed within the support provided to serve a particular geographic area under either a right of first refusal or competitive bidding approach.”²⁰ However, the PSCW raises a concern that a competitive bidding or right of first refusal approach will not work if the overall amount of funding available through federal universal service is insufficient to fund the proposed right of first refusal or auctions, especially when NPRM does not contemplate any overall increase in the amount of the federal universal service fund.²¹ While it would be hypothetically plausible to provide sufficient universal service support that would enable intercarrier compensation rates to be zero, the merits of adding such a purpose to the universal service program is questionable when other pressing needs exist to advance broadband deployment. The PSCW respectfully submits that the limited available universal service funds should be directed toward advancing broadband deployment and not toward driving intercarrier compensation rates below costs.

Opportunity for Waivers for State Innovation

¹⁹ See NPRM ¶ 15, “The Connect America Fund (CAF) we propose to create would ultimately replace all other explicit support provided by the current high-cost fund as well as implicit subsidies from the ICC system.” In the discussion of the bill and keep methodology the NPRM, ¶ 530, states, “Instead, they would recover such costs from their own end users, possibly in conjunction with CAF support.”

²⁰ NPRM ¶ 600.

²¹ See NPRM ¶ 275, “We seek comment on whether the Commission should set an overall budget for the CAF such that the sum of any annual commitments for the CAF and any existing high-cost programs (as modified) in 2012 would be no greater than the projections for the current high-cost program, absent any rule changes.” See NPRM, ¶ 416, “Should the Commission be focused on sizing the CAF to ensure that the total universal service program, not just the high-cost program, remains at its current size?”

Several states and companies have discussed their experiences in rolling out broadband and in building infrastructure. In Wisconsin, there are several small rural companies, companies like Lemonweir Valley Telephone Company and Bloomer Telephone Company, that have deployed fiber to the home throughout all or much of their service territories, enabling the customers of these smaller communities to gain affordable access to voice services, high-bandwidth data transmission speeds and video services that would be the envy of many located in much more urban locations. Other states are finding other methods of deploying advanced services to their customers. In Wisconsin, using Regional Broadband Planning Teams, the PSCW is working to compile a “best practices” list to help other companies replicate the broadband deployment success of other Wisconsin companies. Obviously, these success stories have been possible because of historic and current support provided by existing universal service programs, intercarrier compensation and access charge mechanisms, and other funding opportunities. These success stories, or the potential for more, should not be sacrificed under the ultimate decision that the FCC will make in this docket.

The PSCW is concerned that these kinds of innovative initiatives, custom-tailored to the cost structures and physical and business environments of a state not be lost. States have been, and should continue to be, crucibles of experimentation and testing. The FCC is well aware of the huge differences in the rural and urban characters of the various states and in the natures of their various economies. The PSCW is concerned that some of the proposals in the FCC rules could limit a state’s ability to adopt innovative mechanisms and practices that could better serve the state while still remaining within the tenor and scope of the FCC’s principal directives. For that reason, we ask that the FCC also include the option of providing to the states the opportunity to secure limited waivers or to use other appropriate procedures to make such state experiments

possible on a cooperative basis. The PSCW encourages inclusion of an FCC rule or order provision that would authorize a state commission to conduct experimental or pilot programs to foster efficient and widespread deployment of broadband and other advanced infrastructure.

Conclusion

The PSCW has participated over many years in providing information to guide the FCC toward reform of federal universal service, rationalization of intercarrier charges, and advancement of broadband deployment. The PSCW submits for FCC consideration the comments provided herein, as well as the PSCW's prior comments as referenced and summarized in the attached Appendix A. The PSCW recognizes the monumental task of updating and rationalizing the existing systems of intercarrier compensation and universal service support, and we commend the commitment and effort to make needed changes. In that effort, however, it is vital that one imperfect system not merely be supplanted by another.

Dated at Madison, Wisconsin, May 19, 2011

By the Commission:

/s/ *Sandra J. Paske*

Sandra J. Paske
Secretary to the Commission

SJP:GAE:jrm\DL\Agency\Other Agencies\FCC\2-9-11 NPRM 11-13.docx

List of Prior Comments (with a brief summary of what the PSC said):

Comments of the Public Service Commission of Wisconsin, CC Docket 01-92, May 19, 2005. These comments were provided in response to an FCC FNPRM released March 3, 2005, (*ICC Reform Notice*).

These comments provided seven core principles the PSCW intended to use to evaluate intercarrier compensation reform including:

- (1) rate uniformity
- (2) technological and competitive neutrality
- (3) encourage maintenance and use of PSTN without discouraging alternative networks
- (4) avoid wholesale or retail rate shock
- (5) promote universal service
- (6) a balance of wholesale and retail rates avoiding over- or under recovery, and
- (7) promote jurisdictional cooperation.

Reply Comments of the Public Service Commission of Wisconsin, CC Docket No. 01-92, July 19, 2005. These comments were provided in response to an FCC FNPRM released March 3, 2005, (*ICC Reform Notice*).

These comments evaluated Version 7 of NARUC's ICC Reform Plan. The comments identified outstanding concerns in the following areas: did not promote jurisdictional cooperation, lacked flow-through of access savings, potential adverse impacts on sustainability of USF, potential duplicate support associated with portability, and need to avoid unintended consequences, with transport as a particular example.

Reply Comments of the Public Service Commission of Wisconsin, CC Docket 96-45, October 28, 2005. These comments were provided in response to the Federal State Joint Board on Universal Service's Public Notice 05J-1 (*Joint Board Four Proposals Notice*).

The PSCW advised the FCC to undertake a broader review of universal service and to address the concerns raised by the courts in Quest I & II. The FCC should revise the support mechanism for non-rural companies operating in rural areas. The PSCW pointed out that universal service and intercarrier compensation reforms need to be addressed in a unified manner. In relation to the specific mechanisms presented, the PSCW advised the FCC to maintain the current definition of "rural company" and to not combine study areas or otherwise use statewide costs averaging for rural companies. The comments described the existing problem of statewide averaging for non-rural companies and provided tentative support to the "USERP" proposal as it would provide support to the rural areas of non-rural companies. The PSCW suggested that the FCC provide guidance on the designation of ETCs. The PSCW advised that any change to the USF contribution mechanism should not unfairly burden low volume users.

Comments of the Public Service Commission of Wisconsin, WC Docket No. 05-337, March 23, 2006. These comments were provided in response to the FCC's Further Notice of Proposed Rulemaking, released December 9, 2005 (*Qwest I & II FNPRM*).

The FCC sought comment on how to implement universal service support in a manner that complies with federal law and preserves and advances universal service. The comments explained that High Cost universal service support is important to Wisconsin. The comments explained that the definition of comparable needs to include comparisons of calling scope, affordability, quality of service and types of available services. Sufficient support is needed to attract investment to provide the supported services. PSCW explained how its High Rate Assistance Credit (HRAC) program works, how it would meet the affordability, sufficiency, and comparability objectives of the federal

universal service law, how it could control the size of the USF, and how it is adaptable to other technologies, new services and advanced services.

Reply Comments of the Public Service Commission of Wisconsin, WC Docket No. 05-337, May 25, 2006. These comments were provided in response to the FCC's Further Notice of Proposed Rulemaking, released December 9, 2005 (*Qwest I & II FNPRM*).

The comments explained that the definition of comparable needs to include comparisons of calling scope, affordability, quality of service and types of available services. For comparability, wireless services would be an ideal candidate to try a separate rate-based approach (HRAC program) to USF support. Cost averaging for determination of USF support for non-rural carriers must be sound and should not be over a whole state.

Comments of the Public Service Commission of Wisconsin, CC Docket 01-92, October 25, 2006. These comments were provided in response to an FCC Notice released July 25, 2006, (*Missoula Plan Notice*).

These comments evaluated the Missoula Plan based on the principles previously stated. The comments pointed out that the proposed rates for Track 2 companies can lead to rate shock for retail customers, and are pegged rates that do not follow TELRIC pricing standards and will not promote jurisdictional cooperation. The lack of terms for USF for CLECs is not competitively neutral. The lack of flow-through of access savings can lead to windfalls for Track 1 companies.

Reply Comments of the Public Service Commission of Wisconsin on the Missoula Plan Phantom Traffic Proposal, CC Docket No. 01-92, Dec. 22, 2006. These comments were provided in response to an FCC Public Notice released November 8, 2006 (*Phantom Traffic Notice*).

These comments supported the creation and exchange of call detail records and agreed with other comments that phantom traffic issues should be the first order of business for the FCC. These comments pointed out that the concerns the PSCW previously raised concerning the Missoula Plan had not been addressed.

Reply Comments of the Public Service Commission of Wisconsin on the Missoula Intercarrier Compensation Reform Plan, CC Docket No. 01-92, January 26, 2007. These comments were provided in response to an FCC Notice released July 25, 2006, (*Missoula Plan Notice*).

These comments stated that the Missoula Plan could form the basis for sound intercarrier compensation reform provided certain issues were addressed. The comments reiterated the concern that Track 2 rates under recover traffic sensitive costs, terms are needed for USF for CLECs, and cost savings should flow through to consumers. Further modifications should be vetted through a comment cycle.

Comments of the Public Service Commission of Wisconsin, CC Docket No. 01-92, March 16, 2007. These comments were provided in response to an FCC Notice released Feb. 16, 2007 (*Federal Benchmark Notice*).

The comments agreed with the concerns of early adopter states, states that had already substantially reduced intrastate access rates, that the Missoula Plan Restructure Mechanism could disproportionately disadvantage those states. The comments stated the Missoula Plan is better with a federal benchmark mechanism than without it, but raise concerns about the particular proposed mechanism. The comments suggested an HRAC approach as an alternative.

Reply Comments of the Public Service Commission of Wisconsin, WC Docket No. 05-337, June 28, 2007. These comments were made in response to the Federal State Joint Board's Public Notice 07J-2 released May 1, 2007, (*Joint Board 2007 Notice*).

PSCW recommended use of geographically limited pilots and trial, as proposed by AT&T, and shadow billing, to break the gridlock on serious USF reform and suggested criteria for proposing and selecting the pilots and trials.

Reply Comments of the Public Service Commission of Wisconsin, WC Docket No. 05-337, May 18, 2008. These comments were made in response to the FCC's three companion Notice of Proposed Rulemakings, released Jan. 29, 2008 (*Identical Support Rule NPRM*, *Reverse Auctions NPRM*, *Recommended Decision NPRM*)

These comments reiterated our previously proposed definitions for "sufficient" USF and reasonably comparable rates. The comments pointed to our previous comments that currently there is no USF support for the rural areas of non-rural providers. The comments reiterated previous comments that reform of USF and intercarrier compensation needs to be coordinated.

DL\Agency\Other Agency\FCC\Comments\List of ICC USF Comments



Public Service Commission of Wisconsin

PSC REF#:145662

Eric Callisto, Chairperson
Mark Meyer, Commissioner
Lauren Azar, Commissioner

610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

Public Service Commission of Wisconsin
RECEIVED: 03/08/11, 2:33:57 PM

March 8, 2011
By E-mail

All Incumbent Local Exchange Carriers

Re: Annual Review of the Earnings of Small
Telecommunications Utilities for 2008-2010

5-TI-2111

Comments Due:

Friday, March 18, 2011 – Noon

This docket uses the Electronic Regulatory Filing
system (ERF).

Address Comments To:

**Gary A. Evenson, Administrator
Telecommunications Division**

Public Service Commission
P.O. Box 7854
Madison, WI 53707-7854

In its order dated March 26, 2010, in docket 05-TI-2002, the Commission established \$16.49 as the basic single-party residential flat (R-1) rate used to investigate, determine, and order rates, tolls, or charges for a small telecommunications utility. Attached are calculations that would increase the statewide average R-1 rate to \$17.31. The increase is primarily attributable to the increase in Wisconsin Bell, Inc.'s rate from \$15.54 (\$14.97 + \$.57 USF) to \$17.14 (\$16.06 + \$1.08 USF). The rate for Wisconsin Bell, Inc., is also applied in the calculations as an imputed rate to many competitive local exchange carriers' service packages. The Commission plans to utilize these calculations to issue an order establishing the R-1 rate.

Interested persons are invited to file comments on the calculations according to the above schedule. Comments must be filed using the Electronic Regulatory Filing system (ERF). The ERF system can be accessed through the Public Service Commission's website at <http://psc.wi.gov>. Questions regarding this matter may be directed to the docket coordinator, Anne Waymouth, at: (608) 267-0913, or anne.waymouth@wisconsin.gov.

Sincerely,

Gary A. Evenson
Administrator
Telecommunications Division

GAE:AWW:slg:DL:\Dockets\5-TI-2111\Correspondence\05-TI-2111 Comments.docx

Attachment

cc: Sandy Paske, PSC
Michael Theis, Theis Communications Consulting, LLC
Bill Esbeck, WSTA
Dennis Hildebrandt, Siepert & Co. LLP
Robert Abrams, Kiesling Associates, LLP

**Computation of Statewide Average R-1 Rate
As of 12/31/10**

ILEC Data and Calculation of Average Rate

Utility Number	Utility Name	Exchange Name	Exchange Number	Total R-1 Rate	Total Res Access Lines @ 12/31/10	Weighting Factor	Weighted Rate
150	Amery	AMERY	110	\$ 12.08			
150	Amery	CLAYTON	1100	\$ 12.08			
150	Amery	DEER PARK	1420	\$ 12.08			
170	Amherst	AMHERST	120	\$ 10.39			
170	Amherst	POLONIA	4290	\$ 13.29			
170	Amherst	ROSHOLT	4680	\$ 10.39			
300	Badger Telcom	CHILI	1060	\$ 26.37			
300	Badger Telcom	GRANTON	2130	\$ 25.32			
300	Badger Telcom	GREENWOOD	2190	\$ 25.32			
300	Badger Telcom	NEILLSVILLE	3660	\$ 23.62			
330	Baldwin	BALDWIN	290	\$ 14.77			
330	Baldwin	WOODVILLE	6030	\$ 14.77			
390	Bayland	ABRAMS	10	\$ 19.11			
450	Belmont	BELMONT	420	\$ 12.57			
470	Bergen	BERGEN	470	\$ 12.20			
470	Bergen	SOUTH BERGEN	4986	\$ 12.20			
540	Black Earth	BLACK EARTH	530	\$ 18.94			
590	Bloomer	BLOOMER	580	\$ 11.93			
640	Bonduel	BONDUEL	630	\$ 27.00			
820	Bruce	BRUCE	780	\$ 11.35			
850	BB&W	BOHNERS LAKE	620	\$ 13.23			
850	BB&W	WHEATLAND	5830	\$ 13.23			
1020	Central State	AUBURNDALE	230	\$ 25.81			
1020	Central State	CRANMOOR	1295	\$ 17.61			
1020	Central State	JUNCTION CITY	2630	\$ 22.81			
1020	Central State	LINDSEY	2960	\$ 24.81			
1020	Central State	MILL CREEK	3395	\$ 20.51			
1020	Central State	NECEDAH	3640	\$ 21.81			
1020	Central State	PITTSVILLE	4220	\$ 21.81			
1020	Central State	VESPER	5510	\$ 26.21			
1070	Chequamegon Coop	BARNES	330	\$ 19.54			
1070	Chequamegon Coop	BENOIT	450	\$ 19.54			
1070	Chequamegon Coop	CABLE	840	\$ 19.54			
1070	Chequamegon Coop	CORNUCOPIA	1270	\$ 19.54			
1070	Chequamegon Coop	DRUMMOND	1550	\$ 19.54			
1070	Chequamegon Coop	GRANDVIEW	2120	\$ 19.54			
1070	Chequamegon Coop	IRON RIVER	2520	\$ 19.54			
1070	Chequamegon Coop	LAPOINTE	2880	\$ 19.54			
1070	Chequamegon Coop	MAPLE	3130	\$ 19.54			
1070	Chequamegon Coop	MARENGO	3160	\$ 19.54			
1070	Chequamegon Coop	MASON	3220	\$ 19.54			
1070	Chequamegon Coop	NAMAKAGON	3630	\$ 19.54			
1070	Chequamegon Coop	PORT WING	4340	\$ 19.54			
1090	Chibardun Coop	ALMENA	80	\$ 20.91			
1090	Chibardun Coop	CAMERON	890	\$ 20.91			
1090	Chibardun Coop	DALLAS	1370	\$ 20.91			
1090	Chibardun Coop	PRAIRIE FARM	4390	\$ 20.91			
1090	Chibardun Coop	RIDGELAND	4600	\$ 20.91			
1090	Chibardun Coop	SAND CREEK	4750	\$ 20.91			
1130	Citizen's Coop	CANTON	920	\$ 13.02			
1130	Citizen's Coop	LONG LAKE	3030	\$ 13.02			
1130	Citizen's Coop	NEW AUBURN	3730	\$ 13.02			
1132	Citizen's of Illinois	FAIRPLAY	1370	\$ 17.11			
1170	Clear Lake	CLEAR LAKE	1110	\$ 12.77			
1230	Cochrane Coop	COCHRANE	1180	\$ 15.50			
1230	Cochrane Coop	WAUMANDEE	5660	\$ 15.50			
1350	Coon Valley Farmers	CHASEBURG	1040	\$ 11.83			
1350	Coon Valley Farmers	COON VALLEY	1250	\$ 11.83			
1350	Coon Valley Farmers	STODDARD	5170	\$ 11.83			
1410	Rhineland	ARGONNE	180	\$ 12.49			
1410	Rhineland	CRANDON	1290	\$ 12.49			

**Computation of Statewide Average R-1 Rate
As of 12/31/10**

ILEC Data and Calculation of Average Rate

Utility Number	Utility Name	Exchange Name	Exchange Number	Total R-1 Rate	Total Res Access Lines @ 12/31/10	Weighting Factor	Weighted Rate
1410	Rhineland	CRESCENT LAKE	1300	\$ 14.24			
1410	Rhineland	ELCHO	1690	\$ 12.74			
1410	Rhineland	LAKE TOMAHAWK	2830	\$ 12.74			
1410	Rhineland	PELICAN LAKE	4120	\$ 12.74			
1410	Rhineland	RHINELANDER	4550	\$ 14.24			
1410	Rhineland	RIB LAKE	4560	\$ 14.24			
1410	Rhineland	SUGAR CAMP	5230	\$ 12.74			
1460	Cuba City	CUBA CITY	1330	\$ 11.92			
1630	Dickeyville	DICKEYVILLE	1490	\$ 12.99			
1910	Century of Fairwater Brandon Alto	BRANDON	690	\$ 26.49			
1940	Farmer's Independent	FALUN	1860	\$ 10.35			
1940	Farmer's Independent	GRANTSBURG	2140	\$ 10.35			
1940	Farmer's Independent	TRADE LAKE	5380	\$ 10.35			
1960	Farmer's	BEETOWN	390	\$ 11.07			
1960	Farmer's	CASSVILLE	960	\$ 11.07			
1960	Farmer's	LANCASTER	2850	\$ 11.07			
1960	Farmer's	POTOSI	4350	\$ 11.07			
2050	Century Tel of Forestville	BRUSSELS	800	\$ 21.80			
2050	Century Tel of Forestville	FORESTVILLE	1910	\$ 21.80			
2050	Century Tel of Forestville	LITTLE STURGE	2980	\$ 21.80			
2055	CenturyTel of Central Wisconsin	All		\$ 21.10			
2180	Frontier North	All		\$ 17.75			
2420	Hager Telecom	BAY CITY	350	\$ 15.05			
2420	Hager Telecom	HAGER CITY	2210	\$ 15.05			
2560	Hillsboro	HILLSBORO	2370	\$ 17.98			
2815	CenturyTel of Kendall	All		\$ 16.13			
2930	Century of Wisconsin	LA CROSSE/ONALASKA	2770	\$ 16.69			
2930	Century of Wisconsin	WEST SALEM	5800	\$ 16.69			
2970	Lakefield	NEWTON	3810	\$ 15.35			
2970	Lakefield	NEWTONBURG	3820	\$ 15.35			
3070	Century of Larsen-Readfield	LARSEN	2890	\$ 23.19			
3070	Century of Larsen-Readfield	READFIELD	4490	\$ 15.44			
3090	LaValle Coop	CAZENOVIA	980	\$ 13.06			
3090	LaValle Coop	LAVALLE	2900	\$ 13.06			
3110	Lemonweir Valley	CAMP DOUGLAS	910	\$ 12.08			
3110	Lemonweir Valley	NEW LISBON	3780	\$ 15.08			
3230	Luck	CUSHING	1350	\$ 14.20			
3230	Luck	LUCK	3050	\$ 14.20			
3310	Manawa	MANAWA	3100	\$ 14.08			
3310	Manawa	OGDENSBURG	3940	\$ 12.70			
3400	Marquette- Adams Co. Coop	BROOKS	760	\$ 13.76			
3400	Marquette- Adams Co. Coop	ENDEAVOR	1790	\$ 13.76			
3400	Marquette- Adams Co. Coop	OXFORD	4060	\$ 13.76			
3400	Marquette- Adams Co. Coop	PACKWAUKEE	4070	\$ 13.76			
3650	Mid-Plains	All		\$ 14.01			
3660	Midway	DORCHESTER	1510	\$ 13.73			
3660	Midway	MEDFORD	3280	\$ 12.50			
3660	Midway	STETSONVILLE	5120	\$ 12.50			
3690	Milltown Mutual	FOX CREEK	1940	\$ 14.10			
3690	Milltown Mutual	MILLTOWN	3400	\$ 14.10			
3790	Frontier Comm of Mondovi	MONDOVI	3480	\$ 13.31			
3810	Century of Monroe County	CASHTON	950	\$ 13.05			
3810	Century of Monroe County	CATARACT	970	\$ 13.05			
3810	Century of Monroe County	NORWALK	3890	\$ 13.05			
3810	Century of Monroe County	ONTARIO	3980	\$ 13.05			
3810	Century of Monroe County	SPARTA	5000	\$ 13.05			
3810	Century of Monroe County	WILTON	5910	\$ 13.05			
3880	EastCoast	CLEVELAND	1130	\$ 23.05			
3880	EastCoast	COLLINS	1220	\$ 23.05			
3880	EastCoast	HOWARDS GROVE	2450	\$ 23.05			
3880	EastCoast	SAINT NAZIANZ	4730	\$ 23.05			
3880	EastCoast	VALDERS	5470	\$ 23.05			

**Computation of Statewide Average R-1 Rate
As of 12/31/10**

ILEC Data and Calculation of Average Rate

Utility Number	Utility Name	Exchange Name	Exchange Number	Total R-1 Rate	Total Res Access Lines @ 12/31/10	Weighting Factor	Weighted Rate
3900	Mosinee	MOSINEE	3540	\$ 15.12			
3940	Mount Horeb	MOUNT HOREB	3570	\$ 16.51			
3970	Mount Vernon	MOUNT VERNON	3580	\$ 14.09			
3970	Mount Vernon	NEW GLARUS	3760	\$ 13.04			
3970	Mount Vernon	VERONA	5500	\$ 14.09			
4070	Nelson Telephone Coop	ARKANSAW	200	\$ 16.94			
4070	Nelson Telephone Coop	DURAND	1560	\$ 16.94			
4070	Nelson Telephone Coop	GILMANTON	2050	\$ 16.94			
4070	Nelson Telephone Coop	NELSON	3680	\$ 16.94			
4160	Niagara	AURORA	250	\$ 14.99			
4160	Niagara	FLORENCE	1880	\$ 8.79			
4160	Niagara	NIAGARA	3830	\$ 14.36			
4160	Niagara	SPREAD EAGLE	5040	\$ 14.99			
4210	Northeast	KRAKOW	2750	\$ 14.61			
4210	Northeast	MILL CENTER	3390	\$ 14.86			
4210	Northeast	ONEIDA	3970	\$ 15.11			
4210	Northeast	PULASKI	4440	\$ 14.61			
4260	CenturyTel of Midwest Wisconsin	All exchanges		\$ 19.40			
4580	Grantland	BAGLEY	270	\$ 16.53			
4580	Grantland	BLOOMINGTON	590	\$ 19.58			
4580	Grantland	FENNIMORE	1870	\$ 18.33			
4580	Grantland	MOUNT HOPE	3560	\$ 20.78			
4580	Grantland	WOODMAN	6020	\$ 15.93			
4590	Century Tel of Southern Wis	CAMBRIA	870	\$ 17.37			
4590	Century Tel of Southern Wis	FALL RIVER	1850	\$ 17.79			
4590	Century Tel of Southern Wis	FOX LAKE	1950	\$ 19.38			
4590	Century Tel of Southern Wis	RANDOLPH	4470	\$ 19.38			
4590	Century Tel of Southern Wis	RIO	4620	\$ 14.08			
4860	Indianhead	EXELAND	1820	\$ 15.15			
4860	Indianhead	RADISSON	4460	\$ 15.15			
4860	Indianhead	WEYERHAEUSER	5820	\$ 15.15			
4870	Price County	PHILLIPS	4180	\$ 10.89			
4870	Price County	PRENTICE	4400	\$ 11.24			
4870	Price County	SOO LAKE	4985	\$ 10.89			
5080	Richland Grant Coop	BLUE RIVER	600	\$ 15.02			
5080	Richland Grant Coop	BOAZ	610	\$ 15.67			
5080	Richland Grant Coop	GAYS MILLS	1990	\$ 14.72			
5080	Richland Grant Coop	SABIN	4700	\$ 15.67			
5080	Richland Grant Coop	SOLDIERS GROV	4950	\$ 15.67			
5140	Riverside	JOHNSON CREEK	2600	\$ 18.28			
5140	Riverside	REESEVILLE	4540	\$ 19.08			
5210	Frontier Comm of St. Croix	NEW RICHMOND	3800	\$ 13.81			
5210	Frontier Comm of St. Croix	STAR PRAIRIE	5110	\$ 13.81			
5280	Scandinavia	IOLA	2510	\$ 23.48			
5280	Scandinavia	SCANDINAVIA	4790	\$ 24.48			
5340	Sharon	SHARON	4820	\$ 14.15			
5340	Sharon	SOUTH SHARON	4987	\$ 14.15			
5490	Siren	SIREN	4920	\$ 9.56			
5530	Century Tel of NW Wis	BENNETT	440	\$ 19.89			
5530	Century Tel of NW Wis	DAIRYLAND	1360	\$ 19.60			
5530	Century Tel of NW Wis	DANBURY	1380	\$ 19.89			
5530	Century Tel of NW Wis	Dresser		\$ 19.89			
5530	Century Tel of NW Wis	FREDERIC	1960	\$ 19.89			
5530	Century Tel of NW Wis	GORDON	2110	\$ 19.60			
5530	Century Tel of NW Wis	HAMMOND	2220	\$ 19.89			
5530	Century Tel of NW Wis	LAKE NEBAGAMON	2820	\$ 19.89			
5530	Century Tel of NW Wis	LEWIS	2930	\$ 19.89			
5530	Century Tel of NW Wis	MINONG	3460	\$ 19.89			
5530	Century Tel of NW Wis	OSCEOLA	4020	\$ 19.89			
5530	Century Tel of NW Wis	POPLAR	4300	\$ 19.89			
5530	Century Tel of NW Wis	OLON SPRINGS	4960	\$ 19.89			
5530	Century Tel of NW Wis	WEBB LAKE	5750	\$ 19.89			

**Computation of Statewide Average R-1 Rate
As of 12/31/10**

ILEC Data and Calculation of Average Rate

Utility Number	Utility Name	Exchange Name	Exchange Number	Total R-1 Rate	Total Res Access Lines @ 12/31/10	Weighting Factor	Weighted Rate
5530	Century Tel of NW Wis	WEBSTER	5760	\$ 19.89			
5560	Somerset	SOMERSET	4980	\$ 10.76			
5570	Southeast	WATERFORD	5610	\$ 11.89			
5570	Southeast	WIND LAKE	5920	\$ 14.93			
5660	Spring Valley	SPRING VALLEY	5090	\$ 15.67			
5680	State Long Distance	ELKHORN	1730	\$ 10.47			
5710	Stockbridge & Sherwood	HILBERT	2360	\$ 24.04			
5710	Stockbridge & Sherwood	SHERWOOD	4880	\$ 26.27			
5710	Stockbridge & Sherwood	STOCKBRIDGE	5160	\$ 23.42			
5710	Stockbridge & Sherwood	TISCH MILLS	5350	\$ 23.42			
5846	Telephone USA	All		\$ 24.08			
5850	Tenney	ALMA	60	\$ 20.23			
5950	Tri-County Coop	ELEVA	1710	\$ 17.60			
5950	Tri-County Coop	INDEPENDENCE	2500	\$ 17.60			
5950	Tri-County Coop	NORTHFIELD	3850	\$ 17.60			
5950	Tri-County Coop	PIGEON FALLS	4210	\$ 17.60			
5950	Tri-County Coop	PLEASANTVILLE	4260	\$ 17.60			
5950	Tri-County Coop	STRUM	5210	\$ 17.60			
6000	Union	ALMOND	90	\$ 11.06			
6000	Union	COLOMA	1230	\$ 10.86			
6000	Union	HANCOCK	2230	\$ 11.06			
6000	Union	PLAINFIELD	4240	\$ 11.06			
6030	UTELCO	ALBANY	30	\$ 16.45			
6030	UTELCO	BLANCHARDVILL	560	\$ 16.45			
6030	UTELCO	BROWNTOWN	770	\$ 16.45			
6030	UTELCO	JUDA	2610	\$ 16.45			
6030	UTELCO	MONROE	3490	\$ 16.45			
6030	UTELCO	MONTICELLO	3530	\$ 16.45			
6030	UTELCO	SOUTH WAYNE	4990	\$ 16.45			
6030	UTELCO	WOODFORD	6010	\$ 16.45			
6040	Century Tel of Northern Wis	All except below		\$ 21.16			
6040	Century Tel of Northern Wis	Hawkins	2290	\$ 20.78			
6040	Century Tel of Northern Wis	Manitowish Waters	3110	\$ 21.16			
6040	Century Tel of Northern Wis	Presque Isle	4420	\$ 21.16			
6040	Century Tel of Northern Wis	Sheldon	4860	\$ 21.16			
6040	Century Tel of Northern Wis	Mercer	3330	\$ 18.58			
6040	Century Tel of Northern Wis	Springstead	5080	\$ 18.58			
6050	Frontier Comm of Wis	BEAR CREEK	370	\$ 17.28			
6050	Frontier Comm of Wis	BOWLER	660	\$ 17.28			
6050	Frontier Comm of Wis	CECIL	990	\$ 17.28			
6050	Frontier Comm of Wis	CLINTONVILLE	1150	\$ 17.28			
6050	Frontier Comm of Wis	GRESHAM	2200	\$ 17.28			
6050	Frontier Comm of Wis	KESHENA	2690	\$ 17.28			
6050	Frontier Comm of Wis	MARION	3180	\$ 17.28			
6050	Frontier Comm of Wis	NEOPIT	3700	\$ 17.28			
6050	Frontier Comm of Wis	SHAWANO	4830	\$ 17.28			
6050	Frontier Comm of Wis	TIGERTON	5340	\$ 17.28			
6090	Vernon Coop	DESOTO	1480	\$ 9.91			
6090	Vernon Coop	GENOA	2010	\$ 9.91			
6090	Vernon Coop	LA FARGE	2790	\$ 11.41			
6090	Vernon Coop	LIBERTY POLE	2940	\$ 11.41			
6090	Vernon Coop	READSTOWN	4500	\$ 11.41			
6090	Vernon Coop	VIOLA	5520	\$ 11.41			
6090	Vernon Coop	WESTBY	5780	\$ 11.41			
6090	Vernon Coop	YUBA	6050	\$ 11.41			
6150	Frontier Comm Viroqua	VIROQUA	5530	\$ 14.17			
6250	Waunakee	WAUNAKEE	5670	\$ 15.49			
6440	West Wisconsin Coop	DOWNSVILLE	1530	\$ 16.95			
6440	West Wisconsin Coop	EAU GALLE	1640	\$ 16.95			
6440	West Wisconsin Coop	ELK LAKE	1740	\$ 16.95			
6440	West Wisconsin Coop	MENARDS	3305	\$ 16.95			
6440	West Wisconsin Coop	ROCK FALLS	4660	\$ 16.95			

**Computation of Statewide Average R-1 Rate
As of 12/31/10**

ILEC Data and Calculation of Average Rate

Utility Number	Utility Name	Exchange Name	Exchange Number	Total R-1 Rate	Total Res Access Lines @ 12/31/10	Weighting Factor	Weighted Rate
6440	West Wisconsin Coop	SPRING LAKE	5070	\$ 16.95			
6720	AT&T (Wisconsin Bell) *	All		\$ 17.14			
6750	Wittenberg	ELDERON	1700	\$ 15.03			
6750	Wittenberg	WITTENBERG	5980	\$ 12.53			
6770	Wood County	NEKOOSA	3670	\$ 15.12			
6770	Wood County	PORT EDWARDS	4320	\$ 15.12			
6770	Wood County	RUDOLPH	4690	\$ 15.12			
6770	Wood County	WISCONSIN RAPIDS	5970	\$ 15.12			
Total ILECs				\$ 17.32	1,086,904	0.693	\$ 12.01
CLECs and resellers:							
	Public data	See note 1		\$ 17.54	50,712	0.032	\$ 0.57
	Confidential data			\$ 17.26	430,106	0.274	\$ 4.74
Totals / Statewide Average					1,567,722	1.000	\$ 17.31

Shaded data was filed confidentially or is derived from confidential data.

Note 1: Additional data for publicly filed responses is available upon request.

* The USF surcharge for Wisconsin Bell, Inc., was \$1.65 in 2010. However, a significant part of that rate was attributable to a true-up from the previous year. For this R-1 purpose, the USF surcharge true-up was removed from the calculation and \$1.08 used as the USF adder.